

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KURT A. BENSHOOF, A.R.W. by and  
through his father, KURT A. BENSHOOF,  
BRETT FOUNTAIN, URVE MAGGITT,  
Plaintiffs,

v.

ANDREA CHIN, ANTHONY BELGARD,  
DONOVAN BROUSSARD, NATHAN  
CLIBER, CATHERINE CORNWALL,  
GREGG CURTIS, JANE DOE, JENNY  
DURKAN, JOHN DUUS, NICHOLAS  
EVANS, PASCAL HERZER, RYAN ELLIS,  
MICHAEL FOX, TYLER GOSLIN, JULIE  
KLINE, ERNEST JENSEN, JONATHAN  
KIEHN, SPENCER KURZ, MAGALIE  
LERMAN, RICHARD LIMA, ADAM  
LOSLEBEN, YVES LUC, SARAH  
MACDONALD, JACOB MASTERSON,  
GRANT MAYER, STEVEN MITCHELL,  
JOHNATHAN MUSSEAU, BREHON NESS,  
LILIYA NESTERUK, STEPHEN  
OKRUHLICA, KATRINA OUTLAND,  
JESSICA OWEN, SARAH PENDLETON,  
DWAYNE PIRAK, BRIAN REES, BLAIR  
RUSS, JULIE SALLE, DANIEL  
SCHILLING, TY SELFRIDGE, NATHAN  
SHOPAY, STEVEN STONE, MICHAEL  
TRACY, MELANIE TRATNIK, SARAH  
TURNER, TREVOR TYLER, MICHAEL  
VIRGILIO, ANDREW WEST, CHAD  
ZENTNER, in their individual capacities,  
CITY OF SEATTLE, KING COUNTY,  
Defendants.

NO. 2:24-cv-00808-JHC

**DECLARATION OF MICHAEL TRACY  
IN SUPPORT OF DEFENDANTS'  
JOINDER TO CITY OF SEATTLE'S  
REPLY TO PLAINTIFF'S RESPONSE  
TO ORDER TO SHOW CAUSE AND  
OBJECTION TO PROOFS OF SERVICE**

1 I, Michael Tracy, declare under penalty of perjury pursuant to the laws of the United  
2 States and the State of Washington, as follows:

3 1. I am over the age of 18 and am competent to testify to the facts stated in this  
4 declaration. I have personal knowledge of the facts set forth in this declaration, and could testify  
5 competently to them if called upon to do so.

6 2. I have not been served with a Summons and Complaint in this matter.

7 I declare under penalty of perjury under the laws of the United States of America and the  
8 State of Washington that the foregoing is true and correct.

9 Signed on this 23rd day of May, 2025, at Seattle, King County, Washington.

10  
11 s/ Michael Tracy

12 Michael Tracy, WSBA No. 51226  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the United States and the State of Washington that on May 23, 2025, the foregoing document was served upon the following parties in the manner indicated below:

Kurt Benshoof  
22701 42<sup>nd</sup> Place W  
Mount lake Terrace, WA 98043  
Tel: (206) 460-4202  
Email: [docwccinmatefederal@doc1.wa.gov](mailto:docwccinmatefederal@doc1.wa.gov)

☐ U.S. Mail, Postage Prepaid  
☐ Legal Messenger  
☐ E-Mail  
☒ CM/ECF

Pro Se Plaintiff

Monica Ghosh  
Darren Anthony Feider  
Sebris Busto James  
15375 SE 30<sup>th</sup> Place, Suite 310  
Bellevue, WA 98007  
[mghosh@sbj.law](mailto:mghosh@sbj.law)

☐ U.S. Mail, Postage Prepaid  
☐ Legal Messenger  
☐ E-Mail  
☒ CM/ECF

Attorneys for Defendants Michael Fox, Tyler  
Goslin, and Steven Mitchell

Howard Brown  
1003 West Michigan Street  
Hammon, LA 70401

☒ U.S. Mail, Postage Prepaid  
☐ Legal Messenger  
☐ E-Mail  
☒ CM/ECF

Pro Se Interested Party

Catherine E. Riedo  
Carson W. Canonie  
Assistant City Attorneys  
701 5<sup>th</sup> Avenue, Suite 2050  
Seattle, WA 98104

☐ U.S. Mail, Postage Prepaid  
☐ Legal Messenger  
☐ E-Mail  
☒ CM/ECF

Email: [catherine.riedo@seattle.gov](mailto:catherine.riedo@seattle.gov)  
[Carson.canonie@seattle.gov](mailto:Carson.canonie@seattle.gov)

Attorneys for Defendant City of Seattle

Dated: May 23, 2025

s/ Marry Marze  
Marry Marze, Legal Assistant